

CERTIFICATE OF COMPLIANCE

No. 23-571

IN THE
Supreme Court of the United States

MADELINE PICKENS,

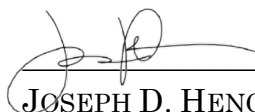
Petitioner,

v.

UNITED STATES,

Respondent.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amicus Curiae* National Taxpayers Union Foundation in Support of Petitioner in the above-entitled case contains 2,983 words, as measured by the word processing software and excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d). I, Joseph D. Henschman, declare under penalty of perjury that the foregoing is true and correct. Executed on December 19, 2023.



JOSEPH D. HENCHMAN

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